

109864

# McDERMOTT, WILL & EMERY

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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312/372-2000

CLIENT/ATTORNEY RECEPTION - 44TH FLOOR  
MAIL/MESSANGER RECEPTION - 31ST FLOOR

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202/887-8000

LOUIS M. RUNDIO, JR.  
312/984-7710

October 2, 1991

Mr. Peter Felitti  
Assistant Regional Counsel  
U.S. EPA  
Region V  
230 South Dearborn Street  
Chicago, Illinois 60604

Re: Great Lakes Asphalt

Dear Mr. Felitti:

On behalf of (CHEMCENTRAL Corporation, an Indiana corporation (hereinafter referred to as the "Company"), I am responding to U.S.EPA's recent letter regarding the Great Lakes Asphalt site. This response is made without any acknowledgment that the Company is a "responsible party" under CERCLA; without any admission of any liability or responsibility under CERCLA or any other statute; and without acknowledgment of the applicability of the authorities referenced in the letter. Furthermore, the Company does not admit or agree that any activities which have been, are now, or will be conducted at the Great Lakes Asphalt site by the U.S.EPA or its representatives are warranted or are authorized under CERCLA or any other authority. The Company would like to note that until its receipt of U.S.EPA's letter, it was unaware that U.S.EPA considered it to be a potentially responsible party for the Great Lakes Asphalt Site.

With these caveats, the Company hereby informs U.S.EPA that it is willing to enter into negotiations regarding the Company's proportionate financial participation in a de minimis settlement, subject to verification that the Company is, in fact, a responsible party.

Mr. Peter Felitti  
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Please note that your letter was addressed incorrectly. Further contact about this matter should be made with Louis M. Rundio, Jr., McDermott, Will & Emery, 227 West Monroe, Chicago, Illinois 60606, (312) 372-2000.

Very truly yours,

*Louis M. Rundio, Jr.*  
Louis M. Rundio, Jr. (pjj)

LMR/pjj  
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